Mr. Cesar DeLeon, DPS-10
Office of Pipeline Safety
DOT/RSPA
400 Seventh Street, S.W.
Washington, D. C. 20590

Re: Request for Interpretations

Dear Mr. DeLeon:

The public Service Commission of Nevada (PSCN) now has jurisdiction over liquefied petroleum gas (LPG) systems serving 10 or more users. To Assist the PSCN in conducting pipeline safety inspections of LPG operators, the following interpretations of the Pipeline Safety Regulations are requested:

1) 49 CFR 192.11(a): Please define the word "system." Does "system refer strictly to a distribution network comprised of interconnected pipe for serving 10 or more customers, or could "system" include situations involving 10 or more individual tanks serving 10 or more individual customers? (Assume the system is not located in a public place). For example, could a privately owned mobile home park having 10 individual tanks serving 10 individual customers be subject to the Pipeline Safety Regulations even though these is no interconnection between customers? Would a system (located on private property) consisting of two tanks, each tank serving 9 customers, be jurisdictional to OPS? (Assume the park owner purchases the LPG from a supplier and then bills the customers for their individual consumption).

2) 49 CFR 192.199: On a small LPG system, could a single pressure regulator equipped with an internal relief device satisfy the requirements of 49 CFR 192.199? What is a "district regulator station" as defined by the Office of Pipeline Safety? Could a "district regulator station" consist of a single pressure regulator used to lower container pressure to distribution pressure in a small LPG system?

3) 49 CFR 192.739 and NFPA 58/59: If an LPG supplier (not the LPG operator) owns the LPG container and the pressure regulator used to lower the LPG pressure from container to distribution pressure, must the LPG operator ensure that the pressure regulator is inspected and maintained by the LPG supplier in accordance with 49 CFR 192.739 and that the container and appurtenances meet the applicable requirements of NFPA 58/59? Who is responsible, the LPG supplier or the LPG operator? Are the container, appurtenances and regulator part of the "system"?

4) NFPA 58-2213: In southern Nevada, where summertime high temperatures can be well over 100 degrees Fahrenheit, many LPG suppliers have installed contained relief valves with start-to-discharge setting of 275 psig, rather than the 250 psig setting required by NFPA 58 (1979), Section 2213. The reasoning is that high ambient temperatures can generate enough pressure within the LPG container to cause a 250 psig start-to-discharge relief valve to operate, vending LPG vapor to the atmosphere and thereby cause a possible hazard. LPG suppliers argue that the containers, although having a design pressure rating of 250 psig, have a 4 to 1 safety factor and can withstand much higher pressures. They believe that it is safe to place a 275 psig relief valve on the container rather than dealing with the hazard that a LPG vapor release from a 250 psig relief valve might create. Apparently this practice is very common in the southern most states and some regulatory agencies have made appropriate exceptions to the NFPA requirement (i.e., the state of California). In order for LPG suppliers in Nevada (or LPG operators who may ultimately be responsible for the operation of the LPG system) to continue with this practice, must a waiver be requested and received from OPS? Please explain.

As further inspections and possible enforcement actions are pending, please advise me of your interpretations as soon as possible. If you have any questions which require clarification, I can be contacted at (702) 687-6004. Thank you for your cooperation.

Sincerely,

Jeffrey L. Maples
Gas Pipeline Safety Engineer

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